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December 15, 2022

VIA ECF

Honorable Judge Madeline Cox Arleo
Honorable Judge John Michael Vazquez
Honorable Judge Edward S. Kiel
Honorable Judge Andre M. Espinosa
United States District Court
Martin Luther King Building & US Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Lee v. Dong Bang Corporation et al, 22-cv-01336
Lee v. Dong Bang Corporation et al, 22-cv-06338

Dear Judge Arleo, Judge Vazquez, Judge Kiel and Judge Espinosa,

This firm represents Plaintiff Yu Jung Lee in the above-referenced matters.

Plaintiff, Yu Jung Lee, by and through her undersigned counsel, pursuant to Federal Rules of Civil Procedure 42(a)(2), respectfully requests that this court consolidate Lee v. Dong Bang Corporation et al, Index No. 22-1336 (“the wage case”) with a newly filed case, Lee v. Dong Bang Corporation et al, Index No. 22-cv-6338 (“the Discrimination Case”) to this Court. In support of this unopposed Motion, Plaintiff states as follows:

1. On March 11, 2022, Plaintiff filed the suit to seek her unpaid wage under FLSA and New Jersey State Law, Lee v. Dong Bang Corporation et al, Index No. 22-1336. Currently, this case is pending.
2. Plaintiff Yu Jung Lee filed complaint against Dong Bang Corporation, Joo Hee Kim and Mi Ja Kim in District Court of New Jersey, Lee v. Dong Bang Corporation et al, Index No. 22-cv-6338 on October 28, 2022, under Title VII Discrimination in the workplace in violation of the Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 (“Section 1981”) and the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. (“NJLAD”) This case is assigned to Judge Vazquez and Magistrate Judge Espinosa.
3. Plaintiff of both cases is same, and Defendants of both cases are almost same. The corporation defendant Dong Bang Corporation is a Defendant for both cases and Mi Ja Kim and Joo Hee Kim are individual defendants for both cases.

4. Reassignment of the Discrimination case to this Court is appropriate pursuant to FRCP 42 because both cases are currently pending in the District Court of New Jersey.
5. Having the same judge handling both cases will result in a substantial savings of judicial time and effort to proceed through continued discovery, dispositive motion practice, and trial if necessary.
6. The cases are susceptible to disposition in a single proceeding, as they involve the same claims arising from Plaintiffs' hours worked and wages earned during her employment with Dong Bang Corporation. Also, reassignment is proper to allow the parties to align discovery and depositions on the same schedule.

WHEREFORE, Plaintiff Yu Jung Lee respectfully requests that this Court enter an Order:

- (i) Finding that *Lee v. Dong Bang Corporation et al*, Index No. 22-cv-6338, is related to the case at bar and should be reassigned to this Court;
- (ii) Instructing the Clerk to forward the Order to the Executive Committee together with a request that the Committee reassign *Lee v. Dong Bang Corporation et al*, Index No. 22-cv-6338, from Judge Vazquez to this Court;
- (iii) Instructing the Clerk to forward the Order to Judge Vazquez;
- (iv) Entering additional relief as this Court deems just and proper.

Respectfully submitted,

Ryan J. Kim

Cc: Diane H. Lee, Esq. (via ECF)